

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

**ERIN ENERGY CORPORATION, *et*
al.,¹
Debtors.**

§
§
§
§
§
§
§

Case No. 18-32106

Chapter 11

(Jointly Administered)

**NOTICE OF FILING PROPOSED ORDER
AND DEBTOR IN POSSESSION LOAN DOCUMENTS**

PLEASE TAKE NOTICE that the above-captioned debtors and debtors in possession (collectively, the “Debtors”) hereby file this Notice of Filing Proposed Order and Debtor-In-Possession Loan Documents.

Following the hearing held on June 19, 2018, the Debtors and the DIP Lender made the changes agreed to at the hearing regarding the proposed order (the “DIP Order”) granting the *Debtors’ Emergency Motion Pursuant to 11 U.S.C. §§ 105, 361, and 364 and Federal Bankruptcy Rules 2002, 4001 and 9004 for a Final Order Authorizing the Debtors to Incur Post-Petition Secured Indebtedness* [Doc. No. 203], the Note, and the Budget. However, the Debtors have been unable to reach an agreement with the Official Committee of Unsecured Creditors (the “Committee”) regarding the changes. Accordingly, the Debtors are submitting the DIP Order, attached hereto as **Exhibit A**, the Note, attached hereto as **Exhibit B**, and the Budget, attached hereto as **Exhibit C**, in a form that they believe was agreed to on the record at the hearing. Red lines of the changes made are attached hereto as **Exhibit D**.

¹ The last four digits of Erin Energy Corporation’s (“ERN”) federal tax identification number are 9798. The other Debtors in these cases are: Erin Energy Limited (“EEL”); Erin Energy Kenya Limited (“EEKL”); and Erin Petroleum Nigeria Limited (“EPNL”). The Debtors’ service address is: 1330 Post Oak Blvd., Suite 2250, Houston, TX 77056.

The Debtors request that an emergency telephonic hearing be set to address the Committee's objections to the DIP Order, the Note, and the Budget.

Respectfully submitted this 21st day of June, 2018.

OKIN ADAMS LLP

By: /s/ Matthew S. Okin
Matthew S. Okin
Texas Bar No. 00784695
mokin@okinadams.com
David L. Curry, Jr.
Texas Bar No. 24065107
dcurry@okinadams.com
John Thomas Oldham
Texas Bar No. 24075429
joldham@okinadams.com
Ryan A. O'Connor
Texas Bar No. 24098190
roconnor@okinadams.com
1113 Vine St., Suite 201
Houston, Texas 77002
Tel: 713.228.4100
Fax: 888.865.2118

ATTORNEYS FOR THE DEBTORS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Notice was served upon the parties requesting CM/ECF notice on June 21, 2018.

/s/ Matthew S. Okin
Matthew S. Okin